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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff

vs.

SHEENA ELKIND,

Defendant

Case No.: 2:22-cr-00284-CDS-VCF

**STIPULATION TO CONTINUE
SENTENCING DATE**

(FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, District of Nevada, and Edward G. Veronda Assistant United States Attorney, counsel for the United States of America, and Gabriel L. Grasso, Esq, counsel for SHEENA ELKIND, that the Sentencing currently scheduled for April 17, 2023 at 10:00 p.m., be vacated and set to a date and time convenient to this court but no sooner than sixty (60) days.

Pursuant to General Order No. 2007-04, this stipulation is entered and based upon the following:

1. ELKIND is on pretrial release and does not oppose this continuance.
2. The parties agree to the continuance.
3. Defense Counsel needs additional time to confer with ELKIND regarding sentencing matters.
4. The parties have agreed on this sentencing continuance to allow for further preparation of arguments expected to be presented to this court at sentencing.

1 5. The parties request a date for sentencing in the first half of June 2023.

2 6. Denial of this request for continuance would deny the defense sufficient time to be
3 able to assist in defendant's sentencing and file a Sentencing Memorandum with the
4 court. This is the first request for a continuance of the sentencing date in this case
5 DATED this 5th day of April 2023.

6 GABRIEL L. GRASSO, P.C.
7 Counsel for SHEENA ELKIND

JASON M. FRIERSON
United States Attorney

8 By /s/ Gabriel L. Grasso
9 GABRIEL L. GRASSO, ESQ.

By /s/ Edward G. Veronda
Assistant United States Attorney

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)
)
Plaintiff)
vs.)
SHEENA ELKIND,)
)
Defendant)
_____)

Case No.: 2:22-cr-00284-CDS-VCF

**FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER**

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The parties will require additional time to allow for further preparation of arguments expected to be presented to this court at sentencing.
2. Defense Counsel needs additional time to confer with ELKIND regarding sentencing matters.
3. ELKIND is on pretrial release and does not oppose this continuance.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient

1 time and the opportunity within which to be able to effectively resolve this case, taking
2 into account the exercise of due diligence.

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5 **ORDER**

6 IT IS THEREFORE ORDERED that the Sentencing hearing currently scheduled for
7 April 17, 2023, at 10:00 a.m., be vacated and continued to June 15, 2023 at 10:00 a.m.
8 in courtroom 6B.

9 DATED this 6th day of April, 2023.

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13 CRISTINA D. SILVA
14 UNITED STATES DISTRICT JUDGE
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